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May 1, 2024

VIA ECF

Hon. Nina R. Morrison  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Besedin v. County of Nassau, et al.*  
Docket No. 18-CV-0819 (NRM)(ST)  
File No. 210099

Your Honor:

We represent the defendants in this action. We write to request that the Court extend defendants' time to serve Plaintiff with their motion for summary judgment from May 3, 2024, to June 3, 2024, with a concomitant extension of the rest of the briefing schedule. This is our first request for an extension of this deadline. Plaintiff's counsel consents to this request.

This extension is needed because I have been inundated with dispositive motions, while at the same time Steven Stern and I are engaged in trial preparation for a Child Victim's Act matter, scheduled to commence on May 13, 2024. Additionally, in the short time since the Court issued the present briefing schedule two associates have left our firm. As a result, my ability to complete the summary judgment briefing has been frustrated.

The parties propose the following modified briefing schedule:

- June 3, 2024: Deadline for defendants to serve their motion for summary judgment;
- June 24, 2024: Deadline for plaintiff to serve opposition papers; and
- July 10, 2024: Deadline for defendants to serve reply papers and file the bundled motion.

Thank you for your consideration of this request.

Respectfully submitted,

SOKOLOFF STERN LLP

Handwritten signature of Kiera J. Meehan in black ink.  
KIERA J. MEEHAN

SOKOLOFF STERN LLP

Hon. Nina R. Morrison

May 1, 2024

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CC:

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